

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARSHALL W. COLLINS, GARY
DANNENBERG, THEODORE M. KOLER,
SIMON SALO AND ELMER WALKER,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

vs.

OILSANDS QUEST INC. (f/k/a CANWEST
PETROLEUM CORPORATION),
CHRISTOPHER H. HOPKINS, T. MURRAY
WILSON, KARIM HIRJI, GARTH WONG,
RONALD PHILLIPS, THOMAS MILNE,
GORDON TALLMAN, WILLIAM SCOTT
THOMPSON, PAMELA WALLIN, JOHN
READ, McDANIEL & ASSOCIATES
CONSULTANTS LTD.,

Defendants.

Civil Action No. 11-cv-1288 (JSR)

CLASS ACTION

**LEAD PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR: (1) FINAL APPROVAL OF SETTLEMENT
AND PLAN OF DISTRIBUTION OF NET SETTLEMENT FUND;
AND (2) AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF
LITIGATION EXPENSES**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that on June 14, 2014, at 3:00 p.m., at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, or as soon thereafter as counsel may be heard before the Honorable Jed S. Rakoff, United States District Judge, Lead Plaintiffs will, and hereby do, move for orders and/or judgments: (1) finally approving the settlement of this class action and dismissing the litigation with prejudice and approving the Plan of Distribution of Net Settlement Funds; (2) awarding Lead Counsel attorneys' fees of 30% of the Settlement Fund plus expenses, plus interest on both amounts; (3) awarding Lead Plaintiffs reimbursement of expenses (including lost wages) in a total amount of \$20,000.

Lead Plaintiffs' motion is based upon: (1) Lead Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement and Plan of Distribution of Net Settlement Fund; and (2) Lead Plaintiffs' Memorandum of Law in Support of Application for an Award of Attorneys' Fees and Reimbursement of Expenses, the declarations submitted in support thereof, the Settlement Agreement, all other pleadings and matters of record, and such additional evidence or argument as may be presented in Lead Plaintiffs' motion or at the hearing on Lead Plaintiffs' motion.

Dated: May 23, 2013

Respectfully submitted,
/s/ Judith S. Scolnick
JUDITH S. SCOLNICK (JS-0827)
BETH A. KASWAN
SCOTT+SCOTT, ATTORNEYS AT LAW, LLP
The Chrysler Building
405 Lexington Avenue, 40th Floor
New York, NY 10174
Telephone: (212) 223-6444
Fax: (212) 223-6334
Email: jscolnick@scott-scott.com
bkaswan@scott-scott.com

AND

DAVID R. SCOTT
AMANDA LAWRENCE
SCOTT+SCOTT, ATTORNEYS AT LAW, LLP
156 South Main Street
P.O. Box 192
Colchester, CT 06415
Telephone: (860) 537-5537
Fax: (860) 537-4432
Email: david.scott@scott-scott.com
alawrence@scott-scott.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2013, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 23, 2013.

/s/ Judith S. Scolnick
JUDITH S. SCOLNICK (JS-0827)
SCOTT+SCOTT
ATTORNEYS AT LAW, LLP
The Chrysler Building
405 Lexington Avenue, 40th Floor
New York, NY 10174
Telephone: (212) 223-6444
Fax: (212) 223-6334
Email: jscolnick@scott-scott.com

Counsel for Plaintiffs